

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CASEY INVESTIGATIONS, LLC, a
Washington Limited Liability Company
and MARIO A. TORRES, an individual,

Plaintiffs,

vs.

PRONTO PROCESS SERVICE, INC., a
Washington corporation; NORTHWEST RAIL
ENTERPRISES, INC., a Washington
corporation; MARK OWENS, an individual,
GREGORY and MARY LEE RUSTAND,
individually and as a married couple; DIANE
PEFLEY, an individual; A to Z LEGAL
SUPPORT SERVICES; a Washington business
entity; ROBERT G. LACK, an individual,
WASHINGTON STATE PROCESS
SERVERS ASSOCIATION, a Washington
business association; and NATIONAL
ASSOCIATION OF PROFESSIONAL
PROCESS SERVERS, a national business
association,

Defendants.

NO. CV04-1453C

**DEFENDANTS GREGORY
AND MARY LEE RUSTAND,
DIANE PEFLEY AND A to Z
LEGAL SUPPORT SERVICES
INITIAL DISCLOSURES**

DEFS' RUSTANDS, PEFLEY and A to Z INTIAL DISCLOSURES - Page 1 of 6
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NO. CV04-1453C

DAVIES PEARSON, P.C.
ATTORNEYS AT LAW
920 FAWCETT -- P.O. BOX 1657
TACOMA, WASHINGTON 98401
TELEPHONE (253) 620-1500
TOLL-FREE (800) 439-1112
FAX (253) 572-3052

Pursuant to FRCP 26(a)(1), the defendants Rustands, Pefley and A to Z Legal Support Services, provide the following initial disclosures:

A. Witnesses

Rex Prout - Liquor Control Board
Pacific Plaza Building Office: (360) 664-1729
3000 Pacific Ave SE Home: (360) 791-927 Olympia, WA 43094

Prout requested affidavits of service from the courts, which affidavits show service performed by Plaintiff.

Rick Phillips
Address unknown

Cell: (360) 791-9680
Home: (360) 966-9459
Office: (360) 664-1726

Rob Lack met with Phillips to discuss possible misconduct of plaintiff.

Brian Milorkee (sp?) -
Director of Ethics Board
Address Unknown

(360) 586-1811 (360) 586-3265

Rex Prout and Rick Phillips advised Rob Lack to contact Milorkee.

Dina England
Benton County Superior Court
7320 W. Quinault
Kennewick, Washington 99336
(509) 735-8388 (main switch board)

1 Ms. England is a former employee of Armada Corporation. She hold information
2 concerning Plaintiff's offer to perform services and the performance of services by Pronto
Process Service, Inc.

3 P.D.C.
4 Address unknown
(877) 601-2828

5 Rob Lack contacted a person at this office.

6 Attorney Generals Office
7 (360) 586-2780

8 Robert Lack contacted a person at this office.

9 Vicki Montgomery - Office Manager-Pronto
10 PO Box 1194
11 Pasco, WA
(509) 547-1122

12 Montgomery has information concerning the business of plaintiff and the business of
13 Pronto Process Service, Inc.

14 Rachelle Montgomery - Pronto Secretary
15 PO Box 1194
16 Pasco, WA
(509) 547-1122

17 Rachelle Montgomery contacted Casey Investigations regarding personal service in
18 Finley, WA.

19 Dennis Copeland - Legal Couriers (Yakima)
20 PO Box 825
Yakima Washington 98907 (509) 453-1134

21 Copeland contacted Evergreen Financial Services, who indicated Casey Investigations
22 has been doing its process work.

23 DEFS' RUSTANDS, PEFLEY and A to Z INTIAL DISCLOSURES - Page 3 of 6
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1 Diane Pefley - SSP-A2Z Legal Support Service
2 406 W Broadway Suite E
3 Moses Lake, WA 98837
4 (509) 766-2111

5 She is a named defendant and presumably has information about the lawsuit.

6 Gregory Rustand
7 Mary Lee Rustand
8 d/b/a A to Z Legal Support Services
9 1641 Baker Creek Place
10 Bellingham, WA 98226
11 (360) 647-2441

12 Rustands are named defendants and have information about this lawsuit.

13 Susan, Owner
14 Yakima County Credit Service
15 PO Box 9244
16 Yakima, WA 98909 (509)248-1610

17 Plaintiff has been serving all of its papers in this area and surrounding counties
18 continually. When Pronto was working with Yakima County Credit, on average Pronto
19 made \$1500-2000 a month

20 Donesa, employee
21 Evergreen Financial Services
22 PO Box 9073
23 Yakima, WA 98909
24 509-452-6574

25 Mario Torres is doing all of its process work in the area. When Pronto performed the
26 work, Pronto made up to \$4000-5000 a month.

1 Mary Walcott/State of Washington-Support Enforcement Division, Financial Recovery
2 Division and Political Subdivisions.

3 Address unknown

4 (360)902-7432

5 (360)586-2426 fax

6 mwalcott@ga.wa.gov

7 Mario Torres has had a State contract for the past 2 years. He has just gotten an extension
8 in September that is good through 2005 for the serving of child support papers in Asotin,
9 Garfield, Pend Oreille, Adams, Chelan, Douglas, and Grant counties, with State contract
10 number 08702.

11 Mark Owens

12 PO Box 1194

13 Pasco, WA 99301

14 (509) 547-1122

15 Mark Owens has knowledge concerning the business of Pronto Process Service, Inc., the
16 ongoing business of the plaintiffs, the process serving business, comments he expressed
17 to others about the plaintiffs, comments made by Mario Torres to Mark Owens that
18 Torres would put Pronto Process Service, Inc., out of business, and the frivolous nature of
19 plaintiffs' claims.

20 Robert Lack

21 5918 West Yellowstone

22 Kennewick, WA 99336

23 Robert Lack has knowledge concerning his questioning of plaintiffs' use of state time to
24 conduct private business, his comments and questions to others about plaintiffs, and the

25 //////////////

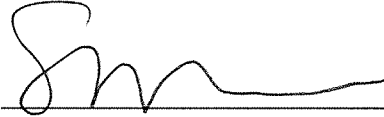
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1 response of the state to his questions.

2 DATED this day 1st day November, 2004.

3 DAVIES PEARSON, P.C.

4 

5 EDWARD S. WINSKILL, WSB #5406

6 SOK-KHIENG K. LIM, WSB #30607

7 Attorneys for Defendants Rustands,

8 Diane Pefley and A to Z Legal

9 Support Services

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23 DEFS' RUSTANDS, PEFLEY and A to Z INITIAL DISCLOSURES - Page 6 of 6
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25 **DAVIES PEARSON, P.C.**

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business entity; ROBERT G. LACK, an
individual, WASHINGTON STATE
PROCESS SERVERS ASSOCIATION, a
Washington business association; and
NATIONAL ASSOCIATION OF
PROFESSIONAL PROCESS SERVERS, a
national business association,

Defendants.

NO. CV04-1453C

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE - Page 1 of 2

NO. CV04-1453C

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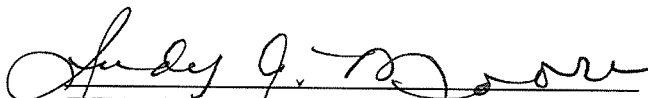
DAVIES PEARSON, P.C.

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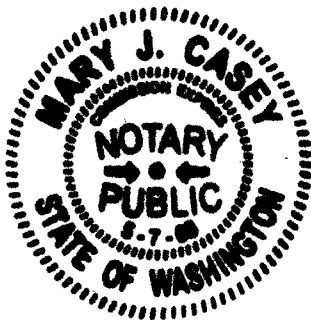
1 STATE OF WASHINGTON)
 2) ss.
 County of Pierce)

3 Judy A. Moore, being first duly sworn on oath, deposes and says:

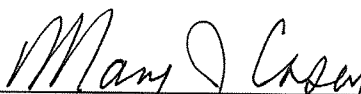
4 That on the 1st day of November, 2004, I delivered a true and correct copy of
 5 Defendants Rustands, A to Z Legal Support Services and Diane Pefley's Initial
 6 Disclosures electronically to Dennis John McGlothin and Theodore Andrew Myhre,
 7 McGlothin Myhre, attorneys for Casey Investigations, LLC and Mario A. Torres at
 8 dennis@mmtriallawyers.com and theo@mmtriallawyers.com, George Fearing and
 9 William E. Davis, Leavy, Schultz, Davis & Fearing, P.S., at gfearing@tricitylaw.com,
 10 Daniel L. Thieme and Andrea Tersigni, Littler Mendelson, P.C. at dthieme@littler.com
 11 and Brian D. Chenoweth, Rycewicz & Chenoweth, LLP, atersigni@littler.com and
 12 brian@northwestlaw.com and also by facsimile transmission.

13
 14 
 15 JUDY A. MOORE., Legal Assistant

16 SIGNED AND SWORN to before me this 1st day of November, 2004, by Judy
 17 A. Moore.



24
 25
 26


 Print Name: Mary J. Casey
 NOTARY PUBLIC in and for the State
 of Washington.
 My commission expires: 5/7/08

CERTIFICATE OF SERVICE - Page 2 of 2

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